

Before the

**FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Annual Assessment of the Status of)	MB Docket No. 12-203
Competition in the Market for the)	
Delivery of Video Programming)	

**COMMENTS OF
Michael Bodine of the City of Tybee Island, GA.**

Michael Bodine of the City of Tybee Island, GA. submits these comments in response to the above-captioned Notice of Inquiry (“NOI”), released July 20, 2012, seeking “data, information, and comment on the state of competition in the delivery of video programming.”

The City of Tybee Island, GA. is a small municipality on a barrier island just south and east of the City of Savannah, GA. with approximately 3,000 year-round residents, but a population that can swell to 10,000 beach-bound guests, and to nearly 30,000 for certain special events at various times of the year. Since outbound communication is critical in the event of a hurricane or weather disaster, we broadcast a wide variety of public interest programming as well as local announcements, on the single PEG channel provided to us by our agreement with Comcast, which took over after our original agreement was made with US Cable.

1. How many channels does your MVPD operator(s) provide for PEG programming?

We operate only a single PEG channel in the community, although we believe we have sufficient unique programming, including rebroadcasts of our Council and Planning Commission meetings,

as well as video of local events, along with a variety of educational and public interest programming, to justify at least an additional channel.

2. On which tier are these channels placed and is extra equipment required to view them?

Comcast went all-digital in 2011, which requires a Digital Transport Adapter in every home in order to view transmitted content of any sort. Tybee's Local Access Channel is provided to every home that gets Comcast, although we share a Comcast local administrative office with Savannah. As a result, many of our homes get Savannah Local Access, instead of Tybee, and it can be very problematic to get the correct programming completed to show our local content.

3. Are there more or fewer PEG channels carried on MVPD systems than were carried as of June 2010?

Tybee has had a single cable access channel since US Cable first set up the system here in about 2005.

4. What data sources exist to track the availability of PEG programming?

No data sources have ever been made available to discover how many homes get Comcast, versus DISH or DirecTV, neither of which carry our local origination broadcasts. In addition, it would be important to know how many of the homes serviced by Comcast are actually receiving the correct local access channel.

5. Tybee has been incrementally improving the quality and quantity of programming delivered over our local access channel. Four years ago, we upgraded our meeting facility from a single camera, to a three camera, remote controlled system. Three years ago, we purchased an additional, portable camera, to allow citizens to create their own programming – while participation has been slow to evolve, programs that are created by locals make for very popular viewing. Last year, our DVD carousel ceased functioning. With a history of over 300 programs

to choose from for broadcasting, having a large storage facility is important to allow us to react to demand for previous broadcasts, such as when some political controversy sweeps our very active citizenry, so we upgraded to a new digital storage system. As part of that purchase, we also are getting a video-on-demand service for a year. Since only a portion of island residents get Comcast, having an online VOD service has been in great demand for some time, and we are looking forward to expanding these services. We also have Facebook and Twitter followings, of 2,527 and 1,159, respectively, as well as a robust web site, www.cityoftybee.org. We have a very small install base of 58 users for a recently-created, information app on WindowsPhone and Android, called "Tybee Updates". Finally, we have an emergency dial-out system that contacts every land-line phone and every registered cell-phone and email address on a demand basis. We have noticed a decline in the number of land-line phones in recent years, emphasizing the need to improve other channels of communication. The more and better our offerings, the more likely we will be able to reach citizens when there comes an evacuation order or important emergency communication that can mean life or death. Our Comcast local access channel is a very popular service, that could be expanded as far as reach by provision of better quality customer care and more competitive pricing, but expanding availability of local origination programs through additional means, such as availability on DISH, DirecTV, and through online services will be necessary to provide reach to significantly larger audiences.

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